

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:25-cv-20557-RAR**

“CHELSEA,” “MARIA,” “VIOLET,”

“JENNY,” and “SLOANE”

Plaintiffs,

v.

STEFAN CIOBANU,

Defendant.

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**AMENDED MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Susanna L. Southworth, PhD, JD of the law firm of Restore the Child, PLLC, 2522 N Proctor St., Ste 85, Tacoma, Washington, 98406, 253-392-4409, for purposes of appearance as co-counsel on behalf of Plaintiffs “CHELSEA,” “MARIA,” “VIOLET,” “JENNY,” and “SLOANE” in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Susanna L. Southworth to receive electronic filings in this case, and in support thereof states as follows:

1. Susanna L. Southworth is not admitted to practice in the Southern District of Florida and is a member in good standing of the Washington State Bar Association and the United States District Court for the Western District of Washington.

2. Movant, Kathryn L. Avila, Esquire, of the law firm of Nigh Goldenberg Raso & Vaughn, PLLC, 14 Ridge Square NW Third Floor, Washington, D.C. 20016, 202-792-7927, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court’s electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be

filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Susanna L. Southworth has made payment of this Court's \$250.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Susanna L. Southworth, by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Susanna L. Southworth at email address: [susanna@restorethechild.com](mailto:susanna@restorethechild.com).

WHEREFORE, Kathryn L. Avila, moves this Court to enter an Order allowing Susanna L. Southworth, to appear before this Court on behalf of Plaintiffs for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Susanna L. Southworth.

Date: February 12, 2025

Respectfully submitted,

/s/ Kathryn L. Avila

Kathryn L. Avila

Fla. Bar No. 1019574

[kavila@nighgoldenberglaw.com](mailto:kavila@nighgoldenberglaw.com)

NIGH GOLDBERG RASO & VAUGHN, PLLC

1333 College Pkwy #1049

Gulf Breeze, Florida 32563

Tel: (771) 210-5557

Attorneys for Plaintiffs

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**CERTIFICATION OF SUSANNA L. SOUTHWORTH**

Susanna L. Southworth, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of Washington State Bar Association and the United States District Court for the Western District of Washington; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

/s/ Susanna L. Southworth

Susanna L. Southworth, PhD, JD

WSBA #35687

susanna@restorethechild.com

Restore the Child, PLLC

2522 N Proctor St, Ste 85

Tacoma, Washington 98406

Tel: (253) 392-4409

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**ORDER GRANTING MOTION TO APPEAR  
*PRO HAC VICE*, CONSENT TO DESIGNATION AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* for Susanna L. Southworth, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the “Motion”), pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Susanna L. Southworth, may appear and participate in this action on behalf of Plaintiffs. The Clerk shall provide electronic notification of all electronic filings to Susanna L. Southworth, at [susanna@restorethechild.com](mailto:susanna@restorethechild.com).

DONE AND ORDERED in Chambers at \_\_\_\_\_, Florida, this  
day of \_\_\_\_\_.

\_\_\_\_\_  
United States District Judge

Copies furnished to: All Counsel of Record